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Ms. Lisa Matta  
 Dept. of Industrial Relations  
 Division of Occupational Safety & Health  
 PSM R6 D3  
 1450 Enea Circle, Suite 550  
 Concord, CA 94520-7996

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## 1. Article Addressed to:

Ms. Lisa Matta  
Dept. of Industrial Relations  
Division of Occupational Safety & Health  
PSM R6 D3  
1450 Enea Circle, Suite 550  
Concord, CA 94520-7996

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CAI/OSHA Doc. Request  
Inspection # 014984187

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Fax 510 242 5353  
jwha@chevron.com

August 16, 2010

Ms. Lisa Matta  
Department of Industrial Relations  
Division of Occupational Safety and Health  
PSM R6 D3  
1450 Enea Circle, Suite 550  
Concord, CA 94520-7996

**Cal/OSHA Document Request – Inspection #314324187 – Chevron Richmond Refinery**

Dear Ms. Matta:

This response, with the attached documents, satisfies Cal/OSHA's Document Requests dated July 29, 2010 and August 2, 2010, except for the Accident Investigation Report. As agreed to with Mr. Thomas DiPalma of my staff, we will submit the Accident Investigation Report by August 30, 2010.

The attachment numbers correspond to the sequential order of the documents on the document request letters. For reference, the last attachment is the Cal/OSHA document requests dated July 29, 2010 and August 2, 2010, and an email from you to Mr. DiPalma clarifying the scope of two items on the first document request.

1. Facility Layout – Berth Map, Area Only

Attachment 1 – Long Wharf facility layout

2. Cal/OSHA Logs 300/300A for the years 2007 to 2009 (8CCR 14301)

Attachment 2A – 2007 Cal/OSHA Log 300/300A

Attachment 2B – 2008 Cal/OSHA Log 300/300A

Attachment 2C – 2009 Cal/OSHA Log 300/300A

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3. OSHA Form 5020 (Employer's First Report of Injury) for the incident dated July 25, 2010

Attachment 3 – OSHA Form 5020

4. Injury and Illness Prevention Program (written safety program) (8CCR 3203)

Attachment 4 – RI-300 – Injury and Illness Prevention Program

5. Inspection records for mooring winch/capstan involved in the incident of July 25, 2010 for the six months prior to July 25, 2010

Attachment 5 – Inspection records for mooring winch MK-405 for the six months prior to July 25, 2010.

6. Training records for the six months prior to July 25, 2010 for the following Wharf operators only:

Attachment 6 – Training records for \_\_\_\_\_, and \_\_\_\_\_

7. Maintenance records for the last year (or last inspection documents) for the mooring winch/capstan involved in the incident of July 25, 2010

Attachment 7A – Maintenance work orders for mooring winch MK-405.

The preventive maintenance (PM) servicing includes testing the hooks, exercising the hooks, lubricating the hooks, and testing the capstan motor and gear box. The information for the sections titled "Release of Operating Equipment for Mechanical Work", "Job Delay Log", and "Completion Comments" are contained in the "Long Description" section.

Attachment 7B – Wharf maintenance PM checklist/schedule.

Attachment 7C – Maintenance repair history briefs for mooring winch MK-405.

8. Safety instructions/equipment operating manuals for the mooring winch/capstan

This is covered in Item #13 below.

REDACTED

Ms. Lisa Matta  
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9. Heat Illness Prevention Program

Attachment 8 – RI-392 – Heat Illness Prevention Plan

10. Copy of Accident Investigation

The investigation is in progress at this time. The final investigation report will be mailed separately as soon as it is available.

11. Names and addresses of the Chevron employees working on the Wharf at the time of the accident on July 25, 2010

Attachment 9 – Names and addresses of Chevron Wharf employees on July 25, 2010.

12. Standard Operating Procedures for the capstan/mooring winch located at Berth #4

Attachment 10 – Routine Duty – “Grease Mooring Hooks”

13. Job Aid or Training materials for the capstan/mooring winch located at Berth #4

Attachment 11A – Job Aid – “Tying Up Ships”

Attachment 11B – OJT Instructor/Qualifier Guide – “Tying Up Ships”

Attachment 11C – Job Aid – “Line Handlers Checklist”

Attachment 11D – OJT Instructor/Qualifier Guide – “Line Handlers Checklist”

Attachment 11E – Excerpt from Long Wharf Process Description: Safety Information, Personal Floatation Devices (PFDs) (pages 10-12)

Attachment 11F – Job Loss Analysis – “Mooring Vessel at Dock”

Attachment 11G – Video: “Safe Line Handling”. This is enclosed as an electronic file on a CD-ROM.

14. Manufacturer Information including size and materials for messenger line rope being used on Berth #4 on July 25, 2010

Attachment 12 – Rope manufacturer’s specifications. Information for the 1” rope size used at the Wharf is highlighted in yellow.

15. Cal/OSHA Document Requests and Clarification Email

Attachment 13A – Cal/OSHA Document Request dated July 29, 2010

Attachment 13B – Clarification email from Ms. Lisa Matta to Mr. Thomas DiPalma, dated August 2, 2010



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**Attachment 13C – Cal/OSHA Document Request dated August 2, 2010**

The Richmond Refinery considers all or part of the attached information to be Confidential Business Information (CBI) under both California and federal law. As a consequence, the Richmond Refinery requests that Cal/OSHA maintain the attached information indefinitely as CBI and requests immediate notification if Cal/OSHA disagrees with this request.

For questions, please contact Mr. Thomas DiPalma at (510) 242-2233.

Sincerely,  
*Original Signed By*  
*Jeff Hartwig*

J. W. Hartwig

Enclosures

Blending & Shipping  
Long Wharf

Routine Duty

Grease Mooring Hooks  
WHF RD 8330

Approval: Carl Johnson

Date: 7-31-98

Purpose: To ensure the safe and efficient operation of mooring hooks.

Frequency: Mooring hooks are greased by the end of each calendar month as per crew schedule.

Action

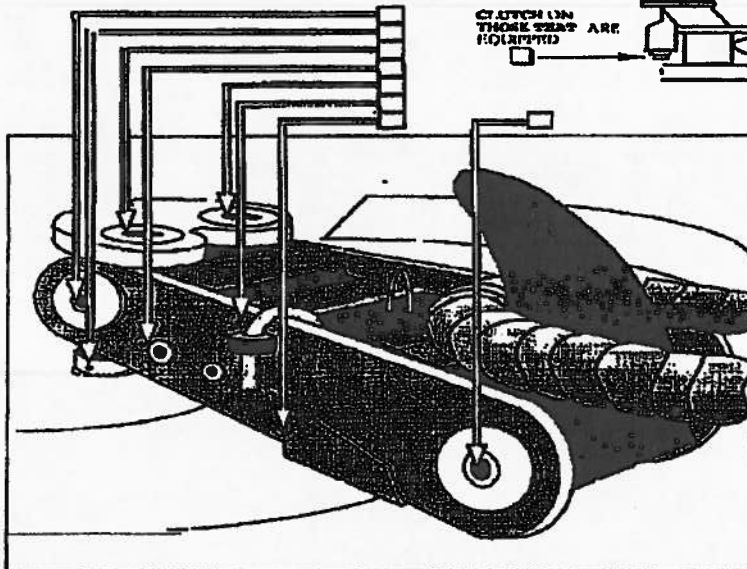
1. Locate mooring hook on the following checklist.
2. Initial each hook to verify that it has been greased and is in working order.
3. If mooring hook is not in working order, then enter the work request # in the appropriate column of this checklist.

**\*\*Mooring Hook Checklist begins next page.\*\***

**MOORING HOOK  
GREASE FITTINGS  
CHECK OFF SHEET**

DATE: 7-23-10  
CREW: D  
OPERATOR:

CLUTCH ON  
THOSE THAT ARE  
EQUIPPED



REDACTED

REMARKS

CONFIDENTIAL BUSINESS INFORMATION

## **RICHMOND REFINERY INSTRUCTIONS**

### **SAFETY**

### **INJURY AND ILLNESS PREVENTION PROGRAM**

- 4.7 Provide training and instruction to all new employees, to all employees given new job assignments and not previously trained, and to supervisors to familiarize them with hazards to which their employees may be exposed. Safety training must be provided: whenever new substances, processes, procedures, or equipment that may represent a new hazard are introduced; and whenever a previously unrecognized hazard is identified.**

Refer to Items 4.2.1 and 4.4.2.

- 4.8 Maintain record of scheduled periodic inspections and training:**
- 1. For Scheduled Periodic Inspections, refer to Item 4.4.5.**
  - 2. For training, refer to Item 4.2.1. Each division maintains employee training records for a minimum of three years.**
- 4.9 Control of entry into process area. Refer to RI-375 for guidelines in checking in and out of process areas.**

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## **RICHMOND REFINERY INSTRUCTIONS**

### **SAFETY**

### **INJURY AND ILLNESS PREVENTION PROGRAM**

of employees, changes in equipment or work processes, and the history of workplace injuries and illnesses.

- f. A record must be maintained for at least one year of each IIPP inspection. OSHA requires that the record must include the names of personnel conducting the inspection, the unsafe conditions and/or work practices identified, and the action taken to correct them. Date and work location should also be included with each record.
  - g. It is acceptable for inspections to be performed by personnel who, through experience or training, are able to identify actual and potential hazards and who understand safe work practices. General audit checklists which can be used to support this inspection process are available or can be developed with assistance from the Safety Section.
- \*6. Level "2" Safety audits are conducted according to a rotating schedule posted on the Refinery HES/Safety website. These audits are performed by a team that commonly includes a manager from another area, a local area representative, the local Field Safety Coordinator and a union Health & Safety Representative. The purpose of these audits is to provide local management with an independent assessment of the effectiveness of its safety program.

#### **4.5 Maintain an investigation procedure for on-the-job injuries and illness.**

Reporting and investigating Industrial Injuries/Illnesses and other incidents which resulted in, or could reasonably have resulted in, a major accident, will follow the Refinery's reporting and investigation standard as outlined in RI-371, "Event Reporting and Incident Investigation."

#### **4.6 Maintain methods and/or procedures for correcting unsafe or unhealthful conditions, work practices and procedures, in a timely manner. If a situation presents an imminent hazard which cannot be corrected without endangering employees or property, all nonessential personnel should be removed from the hazard area, and employees involved in corrective action must be provided with adequate safeguards.**

Refer to Item 4.4.1 (Maintenance Work Order system, Employee Safety Suggestion Program, etc.).

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## **RICHMOND REFINERY INSTRUCTIONS**

### **SAFETY**

### **INJURY AND ILLNESS PREVENTION PROGRAM**

- \*a. Employees are encouraged to take immediate corrective action when possible, and have several other options in remedying unsafe conditions, including communicating directly with the Head Operator, Refinery Shift Supervisor, or Refinery Shift Leader, using the Maintenance Work Order system, working through the area safety committee/team where available, or the Triangle of Prevention (TOP) anonymous reporting system.
- 2. Changes (other than "replacement in kind") to process chemicals, technology, equipment, procedures, and changes to facilities are managed as outlined in RI-370, "Management of Change."
- 3. A Prestart-up Safety Review (PSSR) as specified by the MOC process is performed on all new, modified, or relocated equipment as outlined in RI-367, "Prestart-up Safety Review."
- 4. A Process Hazard Analysis (PHA) will be conducted on all existing plants/processes and on all changes identified by the MOC process as requiring a PHA as outlined in RI-363 "Process Hazards Analyses."
- 5. Scheduled periodic inspections:
  - a. Compliance audits of all elements of the PSM regulation (Title 8 Section 5189) are conducted at least every three years to certify compliance with all provisions of the PSM regulations as outlined in RI-373, "Compliance Audits". A report of the findings of the audit will be developed. The two most recent audits will be retained.
  - b. Regular (routine) inspections are performed in most work locations, with emphasis on safety-related equipment; some also include general plant conditions, work activity review, etc.
  - c. IIPP safety inspections focus on identification and correction of noncompliance with safe work practices and unsafe conditions in the work area.
  - d. Each division/responsible person must have a plan (schedule) for periodically inspecting all work areas.
  - e. The frequency of scheduled inspection is based on the operation or work area involved, the magnitude of the hazards, the proficiency

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## **RICHMOND REFINERY INSTRUCTIONS**

### **SAFETY**

### **INJURY AND ILLNESS PREVENTION PROGRAM**

- \*c. The "Safety - Awareness and Responsibility" booklet which is issued to all employees and is used during new employee orientation classes.
- \*d. Contractors are provided with the "Maintenance & Construction Safe Practices Handbook" during contractor Refinery safety indoctrination training.
- 2. Training - Refer to Item 4.2.1.
- \*3. Meetings - Each meeting begins with a short safety topic.
  - \*a. The management team spends part of their weekly meetings discussing safety issues such as safe work practices, recent incidents, corrective actions and Process Safety Management program improvements.
  - b. Individual divisions/work groups organize and conduct safety meetings (committee or work team) to fit with work schedules, etc. Generally these meetings occur monthly and minutes from the meeting are posted or circulated through the work group.
  - c. Records of safety meetings should be maintained for at least one year in division files.
  - d. The Refinery-Wide Health and Safety Committee and the Joint Health and Safety Committee meet regularly to discuss and resolve employee safety issues. Management representatives attend each meeting.
- 4.4 Develop/maintain procedures for identifying and evaluating hazards, including scheduled periodic inspections to identify unsafe conditions and work practices. Inspections shall be made: whenever new substances, processes, procedures, or equipment that may represent a new hazard are introduced; and whenever a previously unrecognized hazard is identified.
  - 1. With experience, training, and knowledge on previously referenced procedures and practices, individual employees are encouraged to remain vigilant for changes or problems in their work area, either procedural, mechanical, or people oriented, that may present a hazard to themselves, fellow workers and/or property.

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## **RICHMOND REFINERY INSTRUCTIONS**

### **SAFETY**

### **INJURY AND ILLNESS PREVENTION PROGRAM**

information, when appropriate, is language which describes what compliance should look like.

- 4.1 Identify the person, or persons, responsible for maintaining (implementing) the process.**

Refinery Business Managers, Division Managers, and the Maintenance Leadership Team are recognized as the "Responsible Person" with authority and responsibility for implementing and maintaining their work group's safety and health processes.

- 4.2 Ensure employees comply with safety and health work practices.**

- 1. Safety and health training is conducted periodically and as needed. The Development Department maintains an electronic training records data base for all required health and safety training.**
- \*2. Employees are personally accountable for following safe work practices.**
- 3. Incentive and recognition programs for safe work performance are part of the Refinery's safety program.**
- \*4. Safety audits are conducted regularly.**

- 4.3 Communicate with employees on matters relating to safety and health, including provisions designed to encourage employees to inform the employer of hazards without fear of reprisal.**

- 1. Written communications related to employee safety and health come in many different forms. The primary format is the "Safety - Awareness and Responsibility" booklet which is issued to all employees and is additionally used during new employee orientation classes.**
  - \*a. Refinery instructions and standards describe procedures, programs or processes, and contain references to pertinent safety and health information. These documents are available via the Refinery PC Network**
  - b. Circulation and/or posting of "Safety Notes," "Safety Flashes," and safety and health-related bulletins, results of employee exposure monitoring, certain accident investigations (findings and recommendations), and safety meeting minutes are also considered part of our written communications.**

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# **RICHMOND REFINERY INSTRUCTIONS**

## **SAFETY**

## **INJURY AND ILLNESS PREVENTION PROGRAM**

### **1.0 PURPOSE**

- 1.1 This Instruction contains the Safety and Health Policy for the Richmond Refinery and generally summarizes those safety and health programs, processes, and activities that constitute compliance with the requirements of California Code of Regulations, Title 8, Safety Order 3203, "Injury and Illness Prevention Program" (IIPP). This document is the Richmond Refinery's written general plan required by the regulation. Specific plans which detail the IIPP process in each division/group are located in the field.
- 1.2 As required by paragraph (o) of Title 8, Chapter 4 of Section 5189 (General Industry Safety Orders) and Section 6760 (Petroleum Safety Orders), applicable elements of these sections have been incorporated into this plan.

### **2.0 GENERAL SAFETY AND HEALTH POLICY**

- 2.1 Richmond Refinery is committed to continual improvement in the health and safety of employees both on and off the job.
- 2.2 To meet this commitment:
  - 1. The Refinery will provide safe working conditions, ensuring that proper knowledge, training, tools, and facilities are provided in compliance with all applicable laws and regulations.
  - 2. Each employee, as a condition of employment, accepts responsibility for his personal health and safety performance, both on and off the job, and for his job performance as it affects the health and safety of others.
  - 3. Each employee will encourage others to work safely, thus sharing responsibility for the safe actions of his fellow workers.

### **3.0 SCOPE AND RESPONSIBILITIES - IIPP**

- \*3.1 The Lead Safety Specialist will maintain and update RI-300, and ensure that consistent and effective support and oversight is provided to those individuals with authority and responsibility for implementation and maintenance of the program.

### **4.0 INJURY AND ILLNESS PREVENTION PROCESS (IIPP)**

Regulatory text is bolded. Descriptions and references to existing Refinery-wide compliance activities and processes are in plain text. Included with existing compliance

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# **RICHMOND REFINERY INSTRUCTIONS**

**SAFETY**

**INJURY AND ILLNESS  
PREVENTION PROGRAM**

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**300-i**

## Approval and Communication of Refinery, Maintenance, or Engineering Instructions

<b>Document No.:</b> RI-300	<b>Title:</b> Injury and Illness Prevention Plan	<b>Current Date:</b> 1/31/2006
<b>Action:</b> <input type="checkbox"/> New <input checked="" type="checkbox"/> Revision <input type="checkbox"/> Cancellation		<b>Next Revision Due:</b> 1/31/2011
<b>Responsible Organization:</b> HES		<b>Position to Contact With Questions/Suggestions:</b> Compliance Coordinator
<b>Summarize Rewritten Material:</b> General update to make current. Added section 4.4.6 regarding "Level 2 " safety audits per 2004 Corp OE audit recommendation.		

### REQUIRED COMMUNICATION/TRAINING

If Type 2 or Type 3 training is necessary – Instruction Owner is responsible for developing the training material and must work with Development Department Manager and Managers of affected personnel to coordinate training of affected personnel and documentation of training.

This document should be reviewed by:	Type 1 Simple Change	Type 2 On-The-Job Training	Type 3 Classroom Training
All Refinery Personnel	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Operations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Maintenance & Reliability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Technical	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
HES	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other: Refinery Shift Coordinators	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### APPROVALS

<b>Instruction Owner:</b> Joseph Palinkas	<b>Development Manager: (first signature before final routing)</b> Steve Wildman
<b>Operations Manager:</b> Rick Reed	<b>Technical/Reliability Manager:</b>
<b>HES Manager:</b> Jeff Hartwig	<b>Maintenance Manager:</b> Joe Connell
<b>Refinery Manager: (final signature)</b> Jim Whiteside	<b>Other Manager:</b>

*On Completion – Instruction Owner will send file and message to IPC to post on the Refinery server.*

### Necessary Approval for Instructions:

- |  |  |
|--|--|
| <ul style="list-style-type: none"> <li>• Refinery Instructions:</li> <li>• Safe Work Practices:</li> <li>• Emergency Plans (400 Series Ris).</li> <li>• Engineering Instructions:</li> <li>• Maintenance Instructions:</li> <li>• Reliability Instructions:</li> <li>• Cancellation of Instruction:</li> </ul> | Development, Operations, HES, and Refinery Manager<br>Development, Operations, Maintenance, HES, and Refinery Manager<br>Development, Operations, Maintenance, HES, and Refinery Manager<br>Technical and HES Manager<br>Maintenance and HES Manager<br>Reliability and HES Manager<br>RI Owner and Refinery or Operations Manager |
|--|--|

NEW: 9/20/05  
MSFrontPage/reference/forms/MFG-1649-2

MFG-1649-2